

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

FILED

MAR 21 2023

U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,

Plaintiff,

V.

KAYVONN BAILEY,

Defendant.

CAUSE NO.

1 : 23-cr-0045 JPH-TAB

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

18 U.S.C. § 922(a)(6)

Making a False Statement or Furnishing False Identification to a Licensed Firearms Importer

On or about September 2, 2022, within the Southern District of Indiana, Indianapolis Division, KAYVONN BAILEY, the defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson .40 caliber pistol from Beech Grove Firearms Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which statement was intended and likely to deceive Beech Grove Firearms Inc., as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual transferee/buyer of the firearm, when in fact as the defendant then knew, he was not the actual transferee/buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**FORFEITURE**

1. The allegation in Count One of this indictment is realleged as if fully set forth here, for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, and Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461(c).

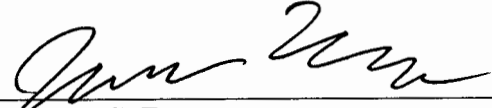
2. If convicted of the offense set forth in Count One, the defendant herein shall, also forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm, ammunition or magazine involved in or used in the offense of which he is convicted.

A TRUE BILL:

A large black rectangular redaction box covers the signature area to the right of the text "A TRUE BILL:". The box is composed of several overlapping rectangles, obscuring any text or signatures that might have been present.

ZACHARY A. MYERS  
United States Attorney

By:

  
\_\_\_\_\_  
Jeremy C. Fugate  
Assistant United States Attorney  
MPB